

CALIFORNIA DEPARTMENT OF EDUCATION
JACK O'CONNELL, State Superintendent of Public Instruction
1430 N Street, Suite 5602
Sacramento, CA 95814-5901
(916) 319-0800

CALIFORNIA STATE BOARD OF EDUCATION
KENNETH NOONAN, President
1430 N Street, Suite 5111
Sacramento, CA 95814-5901
(916) 319-0827

OFFICE OF THE SECRETARY OF EDUCATION
ALAN D. BERSIN, Secretary of Education
1121 L Street, Suite 600
Sacramento, CA 95814
(916) 323-0611

November 1, 2006

The Honorable Raymond Simon
Deputy Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-6100

Dear Deputy Secretary Simon:

On March 9, 2006, the California State Board of Education (SBE) approved initiating a dialogue with the United States Department of Education (ED) to harmonize federal and state accountability requirements for California local educational agencies (LEAs) and schools. This would be accomplished by using the Academic Performance Index (API) system to determine Adequate Yearly Progress (AYP) for California LEAs and schools. In our recent meeting with you in Washington, D.C., you invited us to submit a proposal to that effect so that your staff could review it.

Our proposal is straightforward. For 2007 and beyond, we will use the API to determine AYP and identify LEAs and schools for Program Improvement (PI). If an LEA or school meets its API targets, then it makes AYP. If an LEA or school fails to meet its API targets two years in a row, it will be identified for PI. If a PI LEA or school fails to make its API targets, it will advance in PI. To exit PI, an LEA or school must meet its API targets two years in a row.

While this formulation is simple, we recognize that it may raise a number of issues for you. If, as we hope, it proves possible to resolve these issues through a dialogue with you and your staff, the California Department of Education (CDE) will prepare a more detailed set of amendments with specific reference to the critical elements in the Accountability Workbook.

Underscoring the importance of this proposal, California has already taken several affirmative steps to align its statewide API system with federal AYP requirements:

- Legislation has standardized the minimum "n" size for student subgroups between the state and federal accountability systems.
- Legislation has added Students with Disabilities and English learners to the specific student subgroups for which schools are held accountable.

- The SBE has adopted a more rigorous formula for calculating subgroup targets that will require the closing of achievement gaps between higher and lower-scoring student subgroups.
- The SBE has increased the minimum growth API target from one API point to five points.

The remainder of this letter will outline the key features of our proposal and identify the benefits that would result from its acceptance. The letter is intended to provide your staff with a conceptual framework within which to review the accompanying material, which fully documents the API-based state accountability system.

The material includes:

- Enclosure 1: *2005 Academic Performance Index Base Report Information Guide*
- Enclosure 2: *2006 Academic Performance Index Growth Report Information Guide*
- Enclosure 3: California State Board of Education May 2006 Agenda Item 13

The API

The most important element of our proposal is to substitute the metric of the API for the percentage of students at or above the proficient level in order to determine AYP. The API has been the cornerstone of the California accountability system since 1999. It is similar in concept to the accountability indices already approved by the ED for use in other states. This single-number index, which ranges from 200 to 1000, summarizes a school's performance over a number of indicators. Currently, these indicators consist solely of results from the statewide assessment program with English-language arts and mathematics scores from the California Standards Tests (CSTs) and the California High School Exit Examination (CAHSEE) furnishing the preponderance of the weight of the API. (For details on how to calculate the API, see Enclosure 1.) Both the CSTs and the CAHSEE have been previously approved by the ED for determining AYP.

Growth in the API is measured by the difference between last year's base API and this year's growth API, both at the school and student subgroup level. Base and growth APIs are calculated in the same manner with the same elements, even if new assessments come on line. (For details on how to measure API growth, see Enclosure 2.)

Performance Goal and Growth Targets

The SBE has set an API score of 800 as a rigorous performance goal to which all California public schools should aspire. A school's and subgroup's annual growth target is determined

by taking five percent of the difference between the current API and the performance goal of 800. (See Enclosure 1.) Schools and subgroups must now make a minimum of five points of growth. (See Enclosure 3.) Meeting these growth targets determines eligibility for the state awards or interventions programs. If our proposal is accepted, it would also determine whether or not a school made AYP. Since growth is the basis of the state system, the concept of “safe harbor” as part of AYP would no longer be necessary, substantially reducing complexity.

Subgroup Accountability

The API system has included subgroup accountability since its inception in 1999. The statewide system contains the same subgroups as required under federal law, the same minimum “n” sizes for subgroups, and the same inclusion rules for subgroups. In May 2006 the SBE approved a new target subgroup target structure that required and accelerated the closing of achievement gaps by calculating each subgroup’s growth target separately. (See Enclosure 3.) As a result, lower scoring subgroups will have more ambitious growth targets than higher scoring ones. This change is **not** contingent upon the success of this harmonization proposal. The new method for calculating subgroup targets will be applied for the first time in the calculation of growth targets for 2007.

This is actually more rigorous in many instances than current federal requirements, which require only that subgroups meet a common minimum annual measurable objective. Under the current AYP requirements, a subgroup could actually see a decline in performance from the previous year and still make AYP, so long as the subgroup met this year’s annual measurable objective (AMO). This would not occur under an API system, which is based on growth for every performance band.

Other Academic Indicator and Graduation Rate

The API summarizes results from a variety of assessments, including standards-based tests in science and history/social science; therefore, the other academic indicator for elementary and middle schools is already embedded in the API. Graduation rates will be incorporated into the API once they can be generated accurately by means of a student tracking system. Until then the CDE will continue to calculate them through the method set forth in the current Accountability Workbook and consider the rates separately as an AYP measure.

Benefits from Proposal

Because of its reliability, the API system does not employ confidence intervals. Also, as noted earlier, since the system is based on growth, it has no need for a “safe harbor.” If our API proposal is approved, both features will be dropped from our Accountability Workbook.

The Honorable Raymond Simon
November 1, 2006
Page 4

The elimination of confidence intervals and safe harbor would make accountability decisions much more comprehensible to educators. Now they often view confidence intervals and safe harbor as AYP add-ons that mysteriously benefit some schools and not others. This perception of arbitrariness is a serious threat to the legitimacy of an accountability system.

Legitimacy is the foundation of any accountability system. If parents, educators, and the general public receive mixed messages about school performance, this has a serious impact on accountability, eroding confidence that accountability decisions are made on the basis of sound empirical practice. Harmonization would eliminate this problem. Using the API to identify schools for PI would enable the state as well as LEAs to target interventions in a more rational fashion. If a school is improving sufficiently to meet both school-wide and subgroup API targets, it makes little sense to treat it in the same manner as a school that is not making any progress at all.

Conclusion


In conclusion, the adoption of our proposal would enable us to harmonize federal and state evaluations of LEA and school performance for the upcoming year and beyond. In the past, unfortunately, these evaluations have at times been significantly at variance. The effect has been to undermine both federal and state accountability activities. We therefore believe that this question is of critical importance for California schools.

If you have any questions regarding this proposal, please contact William L. Padia, Deputy Superintendent, Assessment and Accountability Branch, at (916) 319-0812.

Sincerely,



JACK O'CONNELL
State Superintendent of Public Instruction



KENNETH NOONAN, President
State Board of Education



ALAN D. BERSIN, Secretary of Education
Office of the Secretary of Education

JO/KN/AB:rf
Enclosures